

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Rita Arguello

GENERAL INFORMATION:

Name:	Meritor
Address:	115 Ogles Avenue Franklin, KY 42134
Date application received:	12/4/2007
SIC Code/SIC description:	3321, Metal Foil and Leaf (foil and foil containers)
Source ID:	21-213-00015
Agency Interest:	3983
Activity:	APE20070001
Permit:	F-08-008

APPLICATION TYPE/PERMIT ACTIVITY:

<input type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input type="checkbox"/> Conditional major
__Administrative	<input type="checkbox"/> Title V
__Minor	<input type="checkbox"/> Synthetic minor
__Significant	<input checked="" type="checkbox"/> Operating
<input checked="" type="checkbox"/> Permit renewal	<input type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input checked="" type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:001, 1(116)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☐ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☐ Certified by responsible official
- ☐ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☒ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (TPY)	Potential (TPY)
PM/PM10	95/95	565.65/565.65
VOC	52.91	52.91
LEAD	0.25	6.21

SOURCE DESCRIPTION:

Meritor made changes in the last few years; therefore, these changes are being incorporated in this renewal. The changes made are the follows:

Section B: Paint used has been replaced to a non- HAP, water- base- paint, eliminating Xylene from the process. A solvent has been eliminated from Meritor's painting process, and removed from this permit.

EP 08, Back-up Holding Furnace, has been removed from this permit.

EP 17 Back-up Pressure Pour Furnace was added as a new unit. Regulation 401 KAR 63:021 apply.

An ISC3 modeling run for lead (a hazardous air pollutant) showed ambient concentrations, even without controls, would be below levels that would create risk for the exposed populace. Meritor's monitoring records indicated that their lead concentration is below ambient limit. The source plant wide has a limit in lead emissions.

Corrections to the existing permit (F-03-007):

Section B: EP 01, Air Make-Up Units, were listed with no applicable regulation, but 401 KAR 59:010 should have applied; since these units have emissions of less than 5 tons per year; it has been moved to Section C.

EP 10, Drying Heater, New indirect heat exchangers regulation was applied previously, but it is actually a direct fired unit. Emissions are below 5 tons per year. This emission point has been moved to Section C.

Performance Test (stack and exhaust vent) for PM and Lead is required within this permit period.

Section C: EP 01 and EP 10 have been added to Insignificant Activities with regulations applied.

Regulations: 401 KAR 63:021 for lead. Monitoring requirement has been changed.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

1. Particulate (PM10) shall not exceed 95 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.
2. Particulate (PT) shall not exceed 95 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.
3. Volatile organic compound (VOC) emissions shall not exceed 95 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.
4. Hazardous air pollutants (HAPS) emissions shall not exceed 9.5 tons per year individually and 22.5 tons per year combined based on a rolling 12-month rolling total for the entire source to preclude a major source Title V review.